

## **San Bernardino County Continuum of Care (CoC) Reallocation Policy and Procedure**

### **Background**

The U.S. Department of Housing and Urban Development (HUD) states that one of the primary responsibilities of the CoC is to develop a reallocation process for projects funded with CoC funds.

Reallocating funds is an important tool used by CoCs to make strategic improvements to their homelessness system. Through reallocation, the CoC can create new, evidence-informed projects by eliminating projects that are underperforming or are more appropriately funded from other sources. Reallocation is particularly important when new resources are not available.

### **A. Reallocation Policy**

**All** renewal projects are reviewed by the Office of Homeless Services (OHS) and the Interagency Council on Homelessness (ICH) to determine if a project should be considered for reallocation. The OHS staff will provide technical assistance by responding to questions of the ICH, correcting technical inaccuracies if they arise in conversation, and reminding the ICH of their responsibilities if they step outside their authority.

The recommendation for reallocation is based on any one of the following HUD criteria:

- 1) Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon;
- 2) Audit finding(s) for which a response is overdue or unsatisfactory;
- 3) History of inadequate financial management accounting practices;
- 4) Evidence of untimely expenditures on prior award;
- 5) History of other major capacity issues that have significantly impacted the operation of the project and its performance;
- 6) Timeliness in reimbursing sub recipients for eligible costs. HUD will consider a project applicant as meeting this standard if it has drawn down grant funds at least once per month; or
- 7) History of serving ineligible persons, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes.

**HMIS Data Quality.** The CoC evaluates all programs on their HMIS quality for the operating year. It is expected that programs will have no greater than 5% of missing values for any of the universal data elements; programs are able to correct incomplete data to improve the percentages. Data quality outcomes will be collected via the monthly Performance Report Cards and APRs generated for each project.

**San Bernardino County CoC 10-Year Strategy to Prevent and End Homelessness.** Performance measures are used to assess projects' alignment with the priorities noted in the CoC's 10 Year

Strategy to End Homelessness in San Bernardino County. In alignment with *Opening Doors: The Federal Strategic Plan to Prevent and End Homelessness*, our community's revised and updated its strategy entitled, Recalibrating for Results:

A Three Year Evaluation of the 2009–2019 San Bernardino County 10-Year Strategy to End Homelessness goals are as follows:

- 1) Housing First Model
- 2) End Homelessness among Veterans.
- 3) Prevent and End Homelessness for Families, Youth, and Children.

Through the reallocation process, the CoC ensures that projects submitted with the CoC Collaborative Application best align with the HUD CoC funding priorities and contribute to a competitive application that secures HUD CoC dollars to address and end homelessness in San Bernardino County. The CoC will make decisions based on alignment with HUD guidelines, performance measures, and unspent project funds. Reallocated projects will be encouraged to seek funders that will support the contributions these projects make to the CoC.

**Applicant Notification.** Project applicants that administer a project that has been recommended for reallocation will receive notification in writing, outside of *e-snaps* and will include the reasons for the reallocation no later than 15 days before the application deadline which is November 20, 2015.